

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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SILAS CALHOUN and EMILY CALHOUN,  
Individually and as Parents and Next Friends  
of ESTELLA CALHOUN,

Plaintiff,

v.

UNITED STATES OF AMERICA

Defendant.

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**Civil Action No. 04-10480-RGS**

**JOINT MOTION FOR ENLARGEMENT OF TIME  
TO FILE PROPOSED FINDINGS OF FACT AND LAW**

The parties, by and through their attorneys, hereby move this Court for an enlargement of time to file proposed findings of fact and law in the above captioned action. Good cause exists for this motion. Due to a backlog of work the court reporter was unable to complete the trial transcripts by the end of May. Thus, the parties have not been able to complete their respective proposed findings of fact and law by the Court's previously scheduled deadline of May 31, 2007. The court reporter believes the transcripts will be completed by June 11, 2007. Accordingly, the parties request an enlargement of time until July 3, 2007, to file proposed findings of fact and law.

This Motion is made in good faith and is not made to delay the action, or for any other improper purpose.

For the Plaintiffs,

Silas and Emily Calhoun,  
Estella Calhoun,

For the Defendant,

UNITED STATES OF AMERICA

MICHAEL J. SULLIVAN  
United States Attorney

/s/ Michael S. Appel 6/1/2007 (By: APG)  
Michael S. Appel, BBO# 543898  
Anthony V. Agudelo, BBO# 642260  
Sugarman, Rogers, Barshak & Cohen, P.C.  
101 Merrimac Street, 9<sup>th</sup> Floor  
Boston, MA 02114  
617-227-3030 (Voice)  
617-523-4001 (Fax)  
[appel@srbc.com](mailto:appel@srbc.com)

By: /s/ Anton P. Giedt 6/1/2007  
Anton P. Giedt  
Assistant U.S. Attorney  
1 Courthouse Way  
Boston, MA 02210  
617-748-3309 (Voice)  
617-748-3971 (Fax)  
[anton.giedt@usdoj.gov](mailto:anton.giedt@usdoj.gov)

**CERTIFICATE OF SERVICE**

Suffolk, ss.

Boston, Massachusetts  
DATE: June 1, 2007

I, Anton P. Giedt, Assistant U.S. Attorney, do hereby certify that I have this day served a copy of the foregoing upon the Plaintiffs' counsel of record by Electronic Filing.

/s/ Anton P. Giedt  
Anton P. Giedt  
Assistant U.S. Attorney

**PLAINTIFFS' COUNSEL:**

Michael S. Appel  
Anthony V. Argudelo  
Sugarman, Rogers, Barshak & Cohen, P.C.  
101 Merrimac Street  
Boston, MA 02110  
617-227-3030 (Voice)  
617-523-4001 (Fax)  
[appel@srbc.com](mailto:appel@srbc.com)

**AGENCY COUNSEL:**

Joseph Pollard, Captain, USAF  
U.S. S Department of the Air Force  
Air Force Legal Services Agency  
1501 Wilson Boulevard, Room 835  
Arlington, VA 22209-2403  
703-696-9020 (Voice)